

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: MEDFORCE MANAGEMENT, LLC
D/B/A WILLOW CREEK RETIREMENT CENTER CASE NO. 05-00150**

**MOTION TO EXTEND PERIOD OF EXCLUSIVITY FOR FILING OF
DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION**

COMES NOW Medforce Management, LLC d/b/a Willow Creek Retirement Center (the "Debtor"), and files this, its Motion to Extend Period of Exclusivity for Filing of Disclosure Statement and Plan of Reorganization (the "Motion"), and in support thereof, would show unto the Court the following, to-wit:

1. The Debtor initiated this Chapter 11 case by the filing of a voluntary petition pursuant to Title 11, Chapter 11 of the United States Code on or about January 10, 2005 (the "Petition Date"). Subsequent to the Petition Date, the Debtor has been, and is, the duly qualified and acting, Chapter 11 Debtor in Possession herein. The Debtor is in possession and control of the assets of the Debtor in Possession and it is operating and managing the business affairs of the Debtor in Possession.

2. Subsequent to the filing of the petition herein, the Debtor has been involved in negotiations with various creditors and making determinations to allow it to finalize all matters with regard to a Disclosure Statement and the proposed Plan of Reorganization ("Plan") to be filed herein.

3. As a result of the ongoing negotiations with various creditors the Debtor has been unable to finalize its proposed Plan within the 120 days required by the Bankruptcy Code. The statutory exclusivity period will expire on May 10, 2005.

4. Therefore, the Debtor seeks an extension of sixty (60) days until and including July 11, 2005, in which to file its proposed Plan and Disclosure Statement and a concomitant extension of ninety (90) days within which to obtain Plan confirmation .

5. The Debtor does not seek this extension for purposes of delay, but rather, to allow the Debtor an opportunity to fully formulate and file its proposed Plan and Disclosure Statement.

6. The extension requested will not result in any undue prejudice to any creditor or other party-in-interest.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that it be granted until and including July 11, 2005, in which to file a Plan and Disclosure Statement in this Chapter 11 case, and a similar extension to obtain Plan conformation. The Debtor prays for other such general and specific relief as this Court may deem just.

Respectfully Submitted,

MEDFORCE MANAGEMENT, LLC
D/B/A WILLOW CREEK RETIREMENT CENTER

By Its Attorneys

HARRIS & GENO, PLLC

By:


Melanie T. Vardaman, Esq.

OF COUNSEL:


Craig M. Geno, MSB No. 4793
Jeffrey K. Tyree, MSB No. 9049
Melanie T. Vardaman, MSB No. 100392
HARRIS & GENO, PLLC
587 Highland Colony Parkway (39157)
Post Office Box 3380
Ridgeland, Ms 39158-3380
Telephone No.: 601-427-0048
Facsimile No.: 601-427-0050

CERTIFICATE OF SERVICE

I, Melanie T. Vardaman, do hereby certify that I have caused to be served this date, via facsimile and/or United States Mail, postage prepaid, a true and correct copy of the above and foregoing instrument to the following:

Ronald McAlpin, Esq.
Office of the United States Trustee
A. H. McCoy Federal Building, Ste. 706
100 West Capitol Street
Jackson, MS 39269

This the 4 day of May, 2005.


Melanie T. Vardaman, Esq.